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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CHELSEY WIEDENBECK, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED, Plaintiff, v. UNITED EDUCATION INSTITUTE, d.b.a. UEI COLLEGE, Defendant.	Case No. 15-CV-00810-CJC-JEMx *Hon. Cormac J. Carney* **CLASS ACTION** **STIPULATION TO EXTEND TIME TO (1) RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3); AND (2) RELIEF FROM LOCAL RULE 23-3** Complaint Filed: May 26, 2015

Civil Local Rule 8-3 allows the parties to file a stipulation to extend the time to respond to an initial complaint by not more than 30 days. No showing of good cause or order of the Court is required for such an extension. Plaintiff Chelsey

Wiedenbeck filed her Complaint on May 26, 2015. Plaintiff served Defendant United Education Institute ("UEI College") with the Complaint on June 3, 2015. The parties agree that, but for this stipulation, UEI College's deadline to respond to the Complaint is June 24, 2015. The parties stipulate that this deadline shall be extended by 30 days to July 24, 2015.

The parties also request that the Court enter an order relieving Plaintiff of her obligations under Local Rule 23-3. This rule requires a plaintiff in a putative class action to move to certify a class within 90 days of filing of the putative class action complaint, unless otherwise ordered by the Court. Plaintiff brings a putative nationwide class action under the Federal Telephone Consumer Protection Act, 42 U.S.C. Section 227 *et seq.* (the "TCPA"). In her Complaint, Plaintiff alleges that beginning in November 2014, UEI College contacted Plaintiff on her cell phone using an auto-dialer without her prior express consent in violation of the TCPA. Given the complexity of this case and the need for discovery prior to bringing a motion for class certification, the parties believe that good cause exists for the Court to grant relief from the requirements of Local Rule 23-3.

Pursuant to Local Rule 5-4.3.4, all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

IT IS SO STIPULATED.

Dated: June 10, 2015

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ *Mercedes A. Cook*
MERCEDES A. COOK

Attorneys for Defendant United Education Institute, d.b.a. UEI College

Dated: June 10, 2015

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By *\/s/ Abbas Kazerounian*
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